

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
RECEIVED - LAFAYETTE

MAR 18 2021

TONY R. MOORE, CLERK
BY  DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

UNITED STATES OF AMERICA

VERSUS

CHANCE J. SENECA

* CRIMINAL NO. *6:21-CR-00043-01*
* 18 U.S.C. §§ 249(a)(2)(A)(ii),
* 924(c)(1)(A), 1201(a)(1),
* 1519
*
* JUDGE *SUMMERHAYS*
* MAGISTRATE/JUDGE *WHITEHURST*

INDICTMENT

THE FEDERAL GRAND JURY CHARGES:

COUNT 1

HATE CRIME WITH ATTEMPT TO KILL
18 U.S.C. § 249(a)(2)(A)(ii)

On or about June 20, 2020, in the Western District of Louisiana, the defendant, CHANCE J. SENECA, willfully caused bodily injury to H.W. because of H.W.'s actual and perceived gender and sexual orientation. The offense occurred as a result of travel of defendant SENECA and H.W. using a facility and instrumentality of interstate and foreign commerce; in connection with the offense, defendant SENECA used a facility and instrumentality of interstate and foreign commerce; and in connection with the offense, defendant SENECA used weapons that had traveled in interstate and foreign commerce. Specifically, defendant SENECA used a car, a cell phone, the internet, and social media applications such as Grindr and Snapchat, all facilities and instrumentalities of interstate and foreign commerce, in order to lure H.W. to a residence where defendant SENECA intended to and attempted to kill and

dismember H.W. using a hammer and a knife, both of which had traveled in interstate and foreign commerce, and further intended to and attempted to dismember and keep parts of H.W.'s body to use as mementos, trophies, and food. The offense included kidnapping and an attempt to kill H.W. All in violation of Title 18, United States Code, Section 249(a)(2)(A)(ii).

COUNT 2

**POSSESSION OF A FIREARM IN FURTHERANCE OF
A CRIME OF VIOLENCE
18 U.S.C. § 924(c)(1)(A)**

On or about June 20, 2020, in the Western District of Louisiana, the defendant, CHANCE J. SENECA, knowingly possessed a firearm (a Taurus PTIII G2 9-mm pistol bearing serial no. TMC99637) in furtherance of a crime of violence for which defendant SENECA may be prosecuted in a court of the United States (the hate crime offense charged in Count One). All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 3

**KIDNAPPING
18 U.S.C. § 1201(a)(1)**

On or about June 20, 2020, in the Western District of Louisiana, defendant CHANCE J. SENECA did unlawfully and willfully seize, inveigle, kidnap, abduct, and hold H.W. for any reward, purpose, and benefit, and, in committing and in furtherance of the commission of the offense, used a means, facility, and

instrumentality of interstate and foreign commerce; that is, defendant SENECA used a car, a cell phone, the internet, and social media applications such as Grindr and Snapchat. All in violation of 18 U.S.C. § 1201(a)(1).

COUNT 4

**KIDNAPPING
18 U.S.C. § 1201(a)(1)**

On or about June 19, 2020, in the Western District of Louisiana, defendant CHANCE J. SENECA did unlawfully and willfully seize, inveigle, kidnap, abduct, and hold J.F. for any reward, purpose, and benefit, and, in committing and in furtherance of the commission of the offense, used a means, facility, and instrumentality of interstate and foreign commerce; that is, defendant SENECA used a car, a cell phone, the internet, and social media applications such as Grindr and Snapchat. All in violation of 18 U.S.C. § 1201(a)(1).

COUNT 5

**ATTEMPTED KIDNAPPING
18 U.S.C. § 1201(a)(1)**

On or about June 19, 2020, in the Western District of Louisiana, defendant CHANCE J. SENECA did attempt to unlawfully and willfully seize, inveigle, kidnap, abduct, and hold T.G. for any reward, purpose, and benefit, and, in committing and in furtherance of the commission of the offense, used a means, facility, and instrumentality of interstate and foreign commerce; that is, defendant SENECA used

a cell phone, the internet, and social media applications such as Grindr. All in violation of 18 U.S.C. § 1201(a)(1) and (d).

COUNT 6

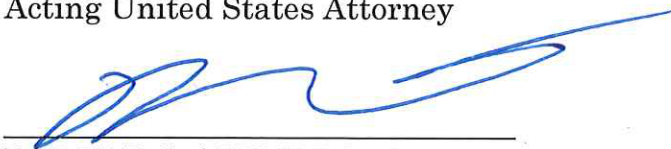
**OBSTRUCTION BY DESTRUCTION OF RECORDS
18 U.S.C. § 1519**

On or about June 20, 2020, within the Western District of Louisiana, the defendant, CHANCE J. SENECA, acting in relation to and in contemplation of a matter within the jurisdiction of the United States, knowingly altered, destroyed, mutilated, concealed, and covered up records and documents with the intent to impede, obstruct, and influence the investigation and proper administration of that matter; that is, defendant SENECA deleted communications between himself and H.W. that were stored on defendant SENECA's phone. All in violation of 18 U.S.C. § 1519.

A TRUE BILL:

REDACTED
GRAND JURY FOREPERSON

ALEXANDER C. VAN HOOK
Acting United States Attorney


ROBERT C. ABENDROTH
(LA Bar #32311)
Assistant United States Attorney
800 Lafayette Street, Suite 2200
Lafayette, LA 70501
Telephone: (337) 262-6618


THOMAS A. JOHNSON
(VA Bar #89295)
Trial Attorney
150 M Street, NE
Washington, DC 20002
Telephone: (202) 616-3004